

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER MANHART, individually
and behalf of all others situated,

Plaintiffs,

v.

AJP Educational Foundation, et al.

Defendants.

Case No. 24:cv8209

Honorable Mary M. Rowland

**DEFENDANTS' JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S COMPLAINT AND TO FILE JOINT STATUS REPORT**

Defendants, AJP Education Foundation, Inc, d/b/a American Muslims for Palestine (“AMP”) Dissenters, Superior Murphy and Jinan Chehade, by and through their undersigned counsel, respectfully move this Court for an extension of time, up to and including December 16, 2024, to answer or otherwise respond to Plaintiff's Complaint and to file a joint status report. In support thereof, Defendants state as follows:

1. Plaintiff filed this putative class action on September 9, 2024, asserting twelve counts against six organizational and four individual Defendants. The Plaintiff asserts that the Defendants are liable for alleged actions and inactions related to an April 15, 2024, protest.
2. The Docket reflects that Defendant AMP's answer is due on October 11, 2024, and that Defendant Dissenters answer is October 7, 2024 (Doc. 8).
3. Superior Murphy's counsel completed a waiver of service today, October 4, 2024, resulting in a response deadline of December 3, 2024. Jinan Chehade was personally served on October 1, 2024, resulting in a response deadline of October 22, 2024.

4. Defendants retained undersigned counsel within the last two days. Given the breadth of the Plaintiff's allegations, counsel for these Defendants requires additional time to prepare their response. Further, undersigned counsel has competing deadlines in other pending cases—those matters will prevent counsel from having sufficient time to devote to this response prior to mid-December. Finally, Defendants' counsel hopes to propose a singular briefing scheduling for all Defendants to promote efficiency for the parties and the Court.

5. Counsel for Plaintiff has agreed to extend the deadline for Defendants' responsive pleading to December 16, 2024.

6. The Federal Rules of Civil Procedure provide that "when an act may or must be done within a specified time, the court may, for good cause, extend the time" to act. Fed. R. Civ. P. 6(b). Defendants' request demonstrates good cause.

7. Defendants' motion for extension of time is made in good faith, for good cause, and is not being made for the purpose of delay or any other improper purpose. Furthermore, the extension of time requested will not prejudice any party and will likely add efficiency to the pleadings process.

WHEREFORE, Defendants AMP, Dissenters, Jinan Chehade and Superior Murphy respectfully request that the Court grant this Joint Unopposed Motion for Extension of Time, extend Defendants' time to respond to Plaintiff's Amended Complaint to December 16, 2024, and, extend the time to file a joint status report to a later date at the discretion of the Court, and grant any other relief the Court deems just and proper.

Respectfully Submitted:

s/Amanda S. Yarusso
**Attorney for American Muslims for Palestine,
Superior Murphy and Jinan Chehade**

Amanda S. Yarusso

/s/ Sheila A. Bedi
**Attorney for Dissenters, Superior
Murphy and Jinan Chehade**

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